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October 24, 2016

Via ECF

Magistrate Judge Robert M. Levy
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Cando, et al. v. Big City Yonkers, Inc., et al.*
Case No. 1:16-cv-01154 (RML)

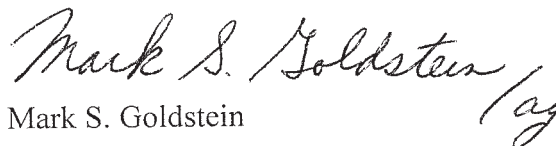
Dear Judge Levy:

We represent Defendants Big City Yonkers, Inc., Autostar Automotive Warehouses Inc., and QPBC, Inc. (collectively, the “Big City Defendants”; together with Plaintiffs, the “Parties”) in the above-referenced action. We are writing, jointly with Plaintiffs’ counsel, in accordance with Rule 2(C) of Your Honor’s Individual Practices and Rules, to respectfully request that the Court convene a pre-motion conference regarding Plaintiff’s anticipated motion for preliminary approval of the Parties’ settlement.

As the Court is aware, during an October 7 settlement conference, the Parties reached a settlement in principle of Plaintiffs’ claims against, among other entities, the Big City Defendants.¹ The Parties have spent the ensuing few weeks reducing the terms of such settlement to writing – in a formal settlement agreement – and preparing the motion for preliminary approval of such settlement. The Parties therefore respectfully request that the Court convene a pre-motion conference concerning the anticipated motion. We believe that convening a pre-motion conference, in advance of the motion itself, will facilitate and ease the Court’s review of the motion papers.

Given the timeliness of the motion, we respectfully request that the conference be convened, via telephone, at Your Honor’s earliest availability.

Respectfully submitted,


Mark S. Goldstein

¹ For the avoidance of doubt, such settlement does not in way impact Plaintiffs’ claims against Michigan Logistics Inc. and Northeast Logistics, Inc., or Michigan Logistics Inc.’s and/or Northeast Logistics, Inc.’s defenses thereto.